



Your business
is our business.

REDACTED FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsitel@jsitel.com

June 23, 2015

ACCEPTED/FILED

JUN 23 2015

Via Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Federal Communications Commission
Office of the Secretary

Re: WC Docket No. 14-58
2015 ETC Annual Report of War Acquisition Corporation d/b/a OTT
Communications
Study Area Code 140064

Dear Ms. Dortch:

On behalf of War Acquisition Corporation d/b/a OTT Communications ("Company"), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.¹ Company seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of the initial section 54.202(a) of its Progress Report on its Five-Year Service Quality Improvement Plan and of outage reporting as required by Section 54.313(a)(1).³

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

No. of Copies rec'd 0+3
List ABCDE

¹ 47 C.F.R. §§ 54.313, 54.422.

² *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 15-712 rel. June 17, 2015 (Protective Order). 47 C.F.R. § 54.313(f)(2).

³ 47 C.F.R. §§ 0.457, 0.459, 54.313(a)(1).

Echelon Building II, Suite 200
9430 Research Blvd., Austin, TX 78759
phone: 512-338-0473, fax: 512-346-0822

Eagandale Corporate Center, Suite 310
1380 Corporate Center Curve, Eagan, MN 55121
phone: 651-452-2660, fax: 651-452-1909

6849 Peachtree Dunwoody Road
Bldg. B-3, Suite 200, Atlanta, GA 30328
phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane
Bountiful, UT 84010
phone: 801-294-4576, fax: 801-294-5124



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June 23, 2015

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Federal Communications Commission
Office of the Secretary

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 14-58
2015 ETC Annual Report of War Acquisition Corporation d/b/a OTT
Communications
Study Area Code 200258
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. ("JSI"), on behalf of its client War Acquisition Corporation d/b/a OTT Communications (the "Company") hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission's rules,¹ withholding from public inspection certain information contained in attachments to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).²

1. The information for which the Company is seeking confidential treatment are attachments to the Company's annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission's rules ("Report").³
2. Rate-of-Return Eligible Telecommunications Carriers ("ETCs") must file with the Commission an initial section 54.202(a) Five-Year Service Quality Improvement Plan ("Five-Year Plan")⁴ and must also report outages, both of which are contained in attachments to the 2015 Report.
3. The information contained in attachments for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment. The Company also seeks withholding from public inspection data pertaining to the Company's outages provided at FCC Form 481 Line 200 attachment, Service

¹ 47 C.F.R. §§ 0.457, 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

³ 47 C.F.R. §§ 54.313, 54.422.

⁴ See *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order DA 14-591 (rel. May 1, 2014).

Outage Reporting. Information of this nature is confidential commercial information routinely withheld from public inspection.

4. With respect to identifying the degree to which the Five-Year Plan concerns a service that is subject to competition, the Line 112 attachment contains information of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment includes competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."⁵ Accordingly, because the Company is a rate-of-return carrier, it must file a five-year service improvement plan which contains proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

With respect to identifying the degree to which the outage data contained in the Line 200 attachment concerns a service that is subject to competition, the information pertains to the network and operations of a telecommunications company that has competitors that could benefit if they were able to have access to this information.

5. With respect to identifying possible exposure to competitive harm, the information contained in the subject attachments is information that is not customarily released to the public. The Five-Year Plan information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.

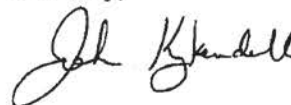
⁵ See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachments, the Company is filing the Five-Year Plan and outage attachments under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.
7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. The Commission has previously concluded that there is a presumptive likelihood of substantial competitive harm from disclosure of outage information.⁶ The Commission also determined the disclosure of outage reporting information to the public could present an unacceptable risk of more effective terrorist activity and could therefore result in potential harm to the public and the national defense.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment, and to the Company's outage data provided at FCC Form 481 Line 200 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,



John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

⁶ See *In the Matter of New Part 4 of the Commission's Rules Concerning Disruptions to Communications*, ET Docket No. 04-35, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 04-188, rel. Aug. 19, 2004, para. 45.

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

REDACTED FOR PUBLIC INSPECTION

FCC Form 481
OMB Control No. 3060-0964/OMB Control No. 3060-0819
July 2013

| | | |
|---|---|--|
| <010> Study Area Code | 200258 | ACCEPTED/FILED |
| <015> Study Area Name | War Acquisition Corp., dba OTT Communications | |
| <020> Program Year | 2016 | JUN 23 2016 |
| <030> Contact Name: Person USAC should contact with questions about this data | Megan Cobleigh | |
| <035> Contact Telephone Number: Number of the person identified in data line <030> | 2079929050 ext. | Federal Communications Commission Office of the Secretary |
| <039> Contact Email Address: Email of the person identified in data line <030> | megan.cobleigh@ottcommunications.com | |

| ANNUAL REPORTING FOR ALL CARRIERS | 54.313 Completion Required | 54.422 Completion Required |
|-----------------------------------|----------------------------------|----------------------------------|
|-----------------------------------|----------------------------------|----------------------------------|

| | | | |
|---|---|-------------------------------------|-------------------------------------|
| <100> Service Quality Improvement Reporting | (complete attached worksheet) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <200> Outage Reporting (voice) | (complete attached worksheet) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <210> <input type="checkbox"/> <-- check box if no outages to report | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <300> Unfulfilled Service Requests (voice) | 0 | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <310> Detail on Attempts (voice) | <div style="border: 1px solid black; height: 40px; width: 300px;"></div> (attach descriptive document) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <320> Unfulfilled Service Requests (broadband) | 0 | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <330> Detail on Attempts (broadband) | <div style="border: 1px solid black; height: 40px; width: 300px;"></div> (attach descriptive document) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <400> Number of Complaints per 1,000 customers (voice) | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <410> Fixed | 1.1 | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <420> Mobile | 0.0 | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <430> Number of Complaints per 1,000 customers (broadband) | | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <440> Fixed | 0.0 | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <450> Mobile | 0.0 | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <500> Service Quality Standards & Consumer Protection Rules Compliance | (check to indicate certification) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <510> <div style="border: 1px solid black; padding: 2px;">200258wv510.pdf</div> | (attached descriptive document) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <600> Functionality in Emergency Situations | (check to indicate certification) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <610> <div style="border: 1px solid black; padding: 2px;">200258wv610.pdf</div> | (attached descriptive document) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <700> Company Price Offerings (voice) | (complete attached worksheet) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <710> Company Price Offerings (broadband) | (complete attached worksheet) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <800> Operating Companies and Affiliates | (complete attached worksheet) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <900> Tribal Land Offerings (Y/N)? | (if yes, complete attached worksheet) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <1000> Voice Services Rate Comparability Certification | Yes | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <1010> <div style="border: 1px solid black; height: 40px; width: 300px;"></div> | (attach descriptive document) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <1100> Certify whether terrestrial backhaul options exist (Yes or No) | <input checked="" type="radio"/> <input type="radio"/> (if not, check to indicate certification) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <1110> | (complete attached worksheet) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <1200> Terms and Condition for Lifeline Customers | (complete attached worksheet) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

| | | | |
|---|-----------------------------------|-------------------------------------|-------------------------------------|
| <2000> | (check to indicate certification) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <2005> | (complete attached worksheet) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet | | | |
| <3000> | (check to indicate certification) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <3005> | (complete attached worksheet) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |

**(100) Service Quality Improvement Reporting
Data Collection Form**

July 2013

| |
|----------------|
| Yes |
| Yes |
| Yes |
| Yes |
| Yes |
| Not Applicable |

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(200) Service Outage Reporting (Voice)
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010> Study Area Code 200258

| | | |
|-------|-----------------|---|
| <015> | Study Area Name | War Acquisition Corp., dba OTT Communications |
|-------|-----------------|---|

| | | |
|-------|--------------|------|
| <020> | Program Year | 2016 |
|-------|--------------|------|

| | | |
|-------|---|----------------|
| <030> | Contact Name - Person USAC should contact regarding this data | Megan Cobleigh |
|-------|---|----------------|

| | | |
|-------|---|-----------------|
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 2079929050 ext. |
|-------|---|-----------------|

| | | |
|-------|---|--------------------------------------|
| <039> | Contact Email Address - Email Address of person identified in data line <030> | megan.cobleigh@ottcommunications.com |
|-------|---|--------------------------------------|

| | | | | | | | | | | | | |
|-------|-----|------|------|------|------|------|------|-----|-----|-----|-----|-----|
| <220> | <a> | <b1> | <b2> | <b3> | <b4> | <c1> | <c2> | <d> | <e> | <f> | <g> | <h> |
|-------|-----|------|------|------|------|------|------|-----|-----|-----|-----|-----|

[illegible]

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(700) Price Offerings Including Voice Rate Data
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

| | | |
|-------|---|---|
| <010> | Study Area Code | 200258 |
| <015> | Study Area Name | War Acquisition Corp., dba OTT Communications |
| <020> | Program Year | 2016 |
| <030> | Contact Name - Person USAC should contact regarding this data | Megan Cobleigh |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 2079929050 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | megan.cobleigh@ottcommunications.com |

<701> Residential Local Service Charge Effective Date
<702> Single State-wide Residential Local Service Charge

1/1/2015

[illegible]

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| | |
|---|--|
| (710) Broadband Price Offerings Data Collection Form | FCC Form 481 OMB Control No. 3060-0986 / OMB Control No. 3060-0819 July 2013 |
|---|--|

| | | |
|-------|---|---|
| <010> | Study Area Code | 200258 |
| <015> | Study Area Name | War Acquisition Corp., dba OTT Communications |
| <020> | Program Year | 2016 |
| <030> | Contact Name - Person USAC should contact regarding this data | Megan Cobleigh |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 2079929050 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | megan.cobleigh@ottcommunications.com |

[illegible]

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(800) Operating Companies
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

| | | |
|-------|---|--|
| <010> | Study Area Code | 200258 |
| <015> | Study Area Name | War Acquisition Corp... dba OTT Communications |
| <020> | Program Year | 2016 |
| <030> | Contact Name - Person USAC should contact regarding this data | Megan Cobleigh |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 2079929050 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | megan.cobleigh@ottcommunications.com |
| <810> | Reporting Carrier | War Telephone LLC |
| <811> | Holding Company | Otelco Inc. |
| <812> | Operating Company | War Telephone LLC |

[illegible]

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**(900) Tribal Lands Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

| | | |
|-------|---|---|
| <010> | Study Area Code | 200258 |
| <015> | Study Area Name | War Acquisition Corp., dba OTT Communications |
| <020> | Program Year | 2016 |
| <030> | Contact Name - Person USAC should contact regarding this data | Megan Cobleigh |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 2079929050 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | megan.cobleigh@ottcommunications.com |

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

[illegible]

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

| | | |
|-------|---|---|
| <010> | Study Area Code | 200258 |
| <015> | Study Area Name | War Acquisition Corp., dba OTT Communications |
| <020> | Program Year | 2016 |
| <030> | Contact Name - Person USAC should contact regarding this data | Megan Cobleigh |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 2079929050 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | megan.cobleigh@ottcommunications.com |

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers

Lifeline

Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

| | | |
|-------|---|---|
| <010> | Study Area Code | 200258 |
| <015> | Study Area Name | War Acquisition Corp., dba OTT Communications |
| <020> | Program Year | 2016 |
| <030> | Contact Name - Person USAC should contact regarding this data | Megan Cobleigh |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 2079929050 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | megan.cobleigh@ottcommunications.com |

200258vv1210.pdf

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- | | | |
|--------|---|-------------------------------------|
| <1221> | Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | <input checked="" type="checkbox"/> |
| <1222> | Details on the number of minutes provided as part of the plan, | <input checked="" type="checkbox"/> |
| <1223> | Additional charges for toll calls, and rates for each such plan. | <input checked="" type="checkbox"/> |

(2000) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

| | | |
|-------|---|---|
| <010> | Study Area Code | 200258 |
| <015> | Study Area Name | WAR Acquisition Corp., dba OTT Communications |
| <020> | Program Year | 2016 |
| <030> | Contact Name - Person USAC should contact regarding this data | Megan Cobleigh |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 2079929050 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | megan.cobleigh@ottcommunications.com |

Select the appropriate responses below (Yes, No, Not Applicable) to ~~note~~ compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification (47 CFR § 54.313(b)(1)i)
 <2011a> 3rd Year Certification (47 CFR § 54.313(b)(1)ii)
 <2011b> Attachment (47 CFR § 54.313(b)(1)ii)

Name of Attached Document(s) Listing Required Information

Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))

- <2012> 2013 Frozen Support Calculation (47 CFR § 54.313(c)(1))
 <2013> 2014 Frozen Support Calculation (47 CFR § 54.313(c)(2))
 <2014> 2015 Frozen Support Calculation (47 CFR § 54.313(c)(3))
 <2015> 2016 and future Frozen Support Calculation (47 CFR § 54.313(c)(4))

Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))

- <2016> Certification Support Used to Build Broadband

Connect America Phase II Reporting (47 CFR § 54.313(e))

- <2017> 3rd year Broadband Service Certification
 <2018> 5th year Broadband Service Certification
 <2019> Interim Progress Certification
 <2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

- <2021> Interim Progress Community Anchor Institutions

Name of Attached Document(s) Listing Required Information

REDACTED FOR PUBLIC INSPECTION

[3000] Rate Of Return Carrier Additional Documentation

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010> Study Area Code 200258
 <015> Study Area Name War Acquisition Corp., dba OTT Communications
 <020> Program Year 2016
 <030> Contact Name - Person USAC should contact regarding this data Megan Cobleigh
 <035> Contact Telephone Number - Number of person identified in data line <030> 2079929050 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> megan.cobleigh@ottcommunications.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(e)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010) Progress Report on 5 Year Plan
 Milestone Certification (47 CFR § 54.313(f)(1)(i))

200258wv3010.pdf

Name of Attached Document Listing Required Information

(3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. ☒

200258wv3012.pdf

(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

30: Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))

(Yes/No) ☒ ☒

(3014) If yes, does your company file the RUS annual report

(Yes/No) ☒ ☒

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

☐

(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☐

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, is your company audited?

(Yes/No) ☒ ☒

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

☐

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☐

(3021) Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit

☐

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,

☐

(3023) Underlying information subjected to a review by an independent certified public accountant

☐

(3024) Underlying information subjected to an officer certification.

☐

(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

[3000] Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

OMB Control No. 3060-0965/OMB Control No. 3060-0819

July 2013

| | |
|---|---|
| <010> Study Area Code | 200258 |
| <015> Study Area Name | War Acquisition Corp., dba OTT Communications |
| <020> Program Year | 2016 |
| <030> Contact Name - Person USAC should contact regarding this data | Megan Cobleigh |
| <035> Contact Telephone Number - Number of person identified in data line <030> | 2079929050 ext. |
| <039> Contact Email Address - Email Address of person identified in data line <030> | megan.cobleigh@ottcommunications.com |

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends

REDACTED FOR PUBLIC INSPECTION

| | |
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| Certification - Reporting Carrier Data Collection Form | FCG Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013 |
|---|--|

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|---|---|
| <010> Study Area Code | 200258 |
| <015> Study Area Name | War Acquisition Corp., dba OTT Communications |
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| <030> Contact Name - Person USAC should contact regarding this data | Megan Cobleigh |
| <035> Contact Telephone Number - Number of person identified in data line <030> | 2079929050 ext. |
| <039> Contact Email Address - Email Address of person identified in data line <030> | megan.cobleigh@ottcommunications.com |

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

| | |
|---|--------------------------------|
| Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients | |
| I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate. | |
| Name of Reporting Carrier: | |
| Signature of Authorized Officer: | Date |
| Printed name of Authorized Officer: | |
| Title or position of Authorized Officer: | |
| Telephone number of Authorized Officer: | |
| Study Area Code of Reporting Carrier: | Filing Due Date for this form: |
| Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001. | |

REDACTED FOR PUBLIC INSPECTION

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|---|--|
| Certification - Agent / Carrier Data Collection Form | PCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013 |
|---|--|

| | |
|---|---|
| <010> Study Area Code | 200258 |
| <015> Study Area Name | War Acquisition Corp., dba OTT Communications |
| <020> Program Year | 2016 |
| <030> Contact Name - Person USAC should contact regarding this data | Megan Cobleigh |
| <035> Contact Telephone Number - Number of person identified in data line <030> | 2079929050 ext. |
| <039> Contact Email Address - Email Address of person identified in data line <030> | megan.cobleigh@ottcommunications.com |

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

| Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier | |
|---|--|
| I certify that (Name of Agent) <u>JSI</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate. | |
| Name of Authorized Agent: <u>JSI</u> | |
| Name of Reporting Carrier: <u>War Acquisition Corp., dba OTT Communications</u> | |
| Signature of Authorized Officer: <u>CERTIFIED ONLINE</u> | Date: <u>06/19/2015</u> |
| Printed name of Authorized Officer: <u>Dennis Andrews</u> | |
| Title or position of Authorized Officer: <u>Senior Vice President</u> | |
| Telephone number of Authorized Officer: <u>2565861420 ext.</u> | |
| Study Area Code of Reporting Carrier: <u>200258</u> | Filing Due Date for this form: <u>07/01/2015</u> |
| Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001. | |

TO BE COMPLETED BY THE AUTHORIZED AGENT:

| Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier | |
|--|--|
| I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate. | |
| Name of Reporting Carrier: <u>War Acquisition Corp., dba OTT Communications</u> | |
| Name of Authorized Agent or Employee of Agent: <u>JSI</u> | |
| Signature of Authorized Agent or Employee of Agent: <u>CERTIFIED ONLINE</u> | Date: <u>06/19/2015</u> |
| Printed name of Authorized Agent or Employee of Agent: <u>Tanea Davis Foglia</u> | |
| Title or position of Authorized Agent or Employee of Agent: <u>Manager - Regulatory Affairs</u> | |
| Telephone number of Authorized Agent or Employee of Agent: <u>3014597590 ext.</u> | |
| Study Area Code of Reporting Carrier: <u>200258</u> | Filing Due Date for this form: <u>07/01/2015</u> |
| Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001. | |

REDACTED FOR PUBLIC INSPECTION

Attachments

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 112

**Five-Year Network Improvement Plan and
Progress Report**

ATTACHMENT REDACTED IN ENTIRETY

**War Telephone LLC
Line 510**

Service Quality Standards and Consumer Protection Rules

The company complies with applicable service quality standards and consumer protections, including, without limitation: (1) reporting major service interruptions to the West Virginia Public Service Commission (WVPSC) in a manner consistent with its requirements; (2) maintaining local service tariffs on file, giving notice of changes to such tariffs to the WVPSC, and making rate and service information available for public inspection at the company's offices and on the company's website; (3) clearly listing all charges and credits on customers' bills; (4) providing full and prompt investigation of, and response to, customer complaints in accordance with dispute resolution procedures established by the WVPSC; (5) providing access to enhanced 911 emergency report centers; (6) participating in a statewide system to assist the hearing impaired and providing service discounts for the deaf, hard of hearing, blind and visually impaired; (7) complying with federal CPNI rules and other applicable consumer privacy protection requirements, including training of employees that have access to CPNI on the rules and procedures for protecting account information and authenticating callers; and (8) implementing procedures that are consistent with the FTC's guidance on measures to detect/prevent identity theft (Red Flag).

In addition, the company adheres to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service, and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the 2015 Open Internet Order when it becomes effective.

**War Telephone LLC
Line 610**

Functionality in Emergency Situations

The company certifies it is able to function in emergency situations. The company has a combination of permanently placed generators at its central office(s), business office(s), 24 x 7 Network Operations Center, and other mission critical locations, plus numerous portable generators for use at remote switching sites. In addition to onsite technicians, all systems are accessible via our remotely located 24 x 7 staffed Network Operations Center, with on-call technicians available 24 hours a day. Poles, cables, central office, remote, and miscellaneous plant equipment are kept at various sites and are available for emergency repairs. Technicians and Operations Management staff carry company-provided cells phones which are used on a daily basis and to maintain a communication link in the event of a major outage on our network or during emergency situations.

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Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

July 2013

| | | |
|-------|-----------------|---|
| <015> | Study Area Name | War Acquisition Corp., dba OTT Communications |
|-------|-----------------|---|

| | | |
|-------|---|----------------|
| <030> | Contact Name - Person USAC should contact regarding this data | Megan Cobleigh |
|-------|---|----------------|

| | | |
|-------|---|-----------------|
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 2079929050 ext. |
|-------|---|-----------------|

<039> Contact Email Address - Email Address of person identified in data line <030> megan.cobleigh@ottcommunications.com

| | | | | | | | | | | | |
|-----|------|------|------|------|------|------|-----|-----|-----|-----|-----|
| <a> | <b1> | <b2> | <b3> | <b4> | <c1> | <c2> | <d> | <e> | <f> | <g> | <h> |
|-----|------|------|------|------|------|------|-----|-----|-----|-----|-----|

[illegible]

REDACTED FOR PUBLIC INSPECTION

(700) Price Offerings including Voice Rate Data
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

| | | |
|-------|---|---|
| <010> | Study Area Code | 200258 |
| <015> | Study Area Name | War Acquisition Corp., dba OTT Communications |
| <020> | Program Year | 2016 |
| <030> | Contact Name - Person USAC should contact regarding this data | Megan Cobleigh |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 2079929050 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | megan.cobleigh@ottcommunications.com |

<701> Residential Local Service Charge Effective Date
<702> Single State-wide Residential Local Service Charge

1/1/2015

<703>

[illegible]

REDACTED FOR PUBLIC INSPECTION

(710) Broadband Price Offerings
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

| | | |
|-------|---|---|
| <010> | Study Area Code | 200258 |
| <015> | Study Area Name | War Acquisition Corp., dba OTT Communications |
| <020> | Program Year | 2016 |
| <030> | Contact Name - Person USAC should contact regarding this data | Megan Cobleigh |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 2079929050 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | megan.cobleigh@ottcommunications.com |

[illegible]

REDACTED FOR PUBLIC INSPECTION

(800) Operating Companies
Data Collection Form

FEC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

| | | |
|-------|---|---|
| <010> | Study Area Code | 200258 |
| <015> | Study Area Name | War Acquisition Corp., dba OTT Communications |
| <020> | Program Year | 2016 |
| <030> | Contact Name - Person USAC should contact regarding this data | Megan Cobleigh |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 2079929050 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | megan.cobleigh@ottcommunications.com |

| | | |
|-------|-------------------|-------------------|
| <810> | Reporting Carrier | War Telephone LLC |
| <811> | Holding Company | Otelco Inc. |
| <812> | Operating Company | War Telephone LLC |

[illegible]

**War Telephone LLC
Line 1210**

Terms and Conditions for Lifeline Customers

War Telephone LLC's terms and conditions of voice telephony plans (local and toll) offered to lifeline customers can be found at the following websites:

<http://www.ottcommunications.com/wp-content/uploads/2015/05/War-Telephone-LLC-Tariff-CURRENT-2014-Access.pdf>

War Telephone LLC (SAC #200258)

Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))

War Telephone LLC hereby certifies that throughout 2014, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream, and currently, it is taking reasonable steps to provide upon reasonable request actual speeds of at least 10 Mbps downstream/1 Mbps upstream broadband service at with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas as determined in an annual survey, and that requests for such service are met within a reasonable amount of time.

War Telephone LLC (SAC 200258)

**Response to Line 3012 - List of Community Anchor Institutions to Which the ETC Newly
Began Providing Service**

The FCC's *USF/ICC Transformation Order* requires a listing of community anchor institutions to which the ETC newly began providing broadband service. War Telephone Company hereby provides the FCC with a list of community anchor institutions to which it newly began providing access to broadband service in calendar year 2014.¹

| Number | Name | Address |
|---------------|--------------------------|------------------------------|
| 1 | Norfolk Southern Railway | No Physical Address, War, WV |

¹ The FCC has defined community anchor institutions in Section 54.5 of its Rules as "schools, libraries, health care providers, community colleges, other institutions of higher education, and other community support organizations and entities."